

THE STATE OF TEXAS §

DEPENDANTS
COPY

TO: HORNBECK OFFSHORE SERVICES, LLC, is a foreign limited liability and may be served with process and citation by serving its registered agent: Corporation Service Company d/b/a CSC-LAWYERS INCORPORATING SERVICE COMPANY at 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218 Defendant.

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

Said answer may be filed by mailing same to: District Clerk's Office, P. O. Drawer NN, Anahuac, Tx. 77514, or by bringing it to the office. Our street address is 404 Washington, Anahuac, Texas. The case is presently pending before the 253rd District Court of Chambers County sitting in Anahuac, Texas, and was filed on the day of 11^h of MAY, 2016. It bears cause number CV30146

PABLO SANCHEZ, GUADALUPE SANCHEZ, HERMELINDA SALDANA, RICHARD SALDANA,
Plaintiff(s)

Vs
HORNBECK OFFSHORE SERVICES, LLC, and ADRIAN BRUCE ADELS, Defendant(s)

The name and address of the Attorney for Plaintiff (or plaintiff, if pro se) Cristobal M. Galindo, P.C., 4151 Southwest Freeway, Suite 602, Houston, Texas 77027

The nature of the demands of said a true and correct copy of the PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE accompanying this citation and made part hereof.

Issued under my hand and the seal of said court, at Anahuac, Texas this the 11TH day of May, 2016.



PATTI L. HENRY, DISTRICT CLERK
CHAMBERS COUNTY, TEXAS
BY Linda Muniz
Linda Muniz, Deputy

OFFICER'S RETURN

Came to hand on the _____ day of _____, 20____, at _____ o'clock ____ .M.
Executed at _____, within the County of _____, at _____ o'clock ____ .M.
On the _____ day of _____, 20____, by delivering to the within named _____

each, in person, a true copy of this citation together with the accompanying copy of the motion, having first attached such copy of citation and endorsed on such copy of citation the date of delivery.

Total fee for serving this citation \$ _____

To certify which witness by hand officially.

Constable of _____ County, Texas

By _____ Deputy



5/11/2016 2:43:04 PM

Patti L. Henry District Clerk

Chambers County, Texas

NO. CV30146

By:  Deputy

PABLO SANCHEZ, GUADALUPE
SANCHEZ, HERMELINDA
SALDANA, RICHARD SALDANA
Plaintiff

IN THE DISTRICT COURT

V.

253RD JUDICIAL DISTRICT

HORNBECK OFFSHORE
SERVICES, LLC, and ADRIAN
BRUCE ADELS
Defendants

CHAMBERS COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, PABLO SANCHEZ, GUADALUPE SANCHEZ, HERMELINDA SALDANA, RICHARD SALDANA, hereinafter called Plaintiffs, complaining of and about HORNBECK OFFSHORE SERVICES, LLC, ADRIAN BRUCE ADELS hereinafter called Defendants, and for cause of action shows unto the Court the following:

DISCOVERY CONTROL PLAN LEVEL

Plaintiff intends that discovery be conducted under Discovery Level 2.

PARTIES AND SERVICE

Plaintiffs, PABLO SANCHEZ, GUADALUPE SANCHEZ, HERMELINDA SALDANA, RICHARD SALDANA, are individuals who reside in Cameron County, Texas.

Defendant, HORNBECK OFFSHORE SERVICES, LLC, is a foreign limited liability and may be served with process and citation by serving its registered agent: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company at 211 E. 7th Street, Suite 620, Austin, TX 78701-3218. CITATION IS REQUESTED AT THIS TIME.

Defendant, ADRIAN BRUCE ADELS, is an individual who resides in Louisiana and who may be served with process at 680 Nancy Street, Mandeville, Louisiana 70448. CITATION IS REQUESTED AT THIS TIME.

JURISDICTION AND VENUE

The subject matter in controversy is within the jurisdictional limits of this court. This court has jurisdiction over the parties because Defendants are Texas residents and/or companies authorized to business in the State of Texas. Venue is proper in CHAMBERS County, Texas, as this is the county in which a substantial portion of the events giving rise to this suit occurred.

Pursuant to Texas Rule of Civil Procedure 47, Plaintiffs specify that they are seeking relief over \$200,000.00 but not exceeding \$1,000,000.00. Further, the amounts of the Plaintiffs' damages are substantial and well in excess of the jurisdictional minimums of this Court. Many elements of damage, including pain, suffering and mental anguish in the past and future, past and future physical impairment, and future lost earning capacity, cannot be determined with mathematical precision. Furthermore, the determination of many of these elements

of damage is peculiarly within the province of the jury. Plaintiffs do not at this time seek any certain amount of damages for any of these particular elements of damage, but would instead rely upon the collective wisdom of the jury to determine an amount that would fairly and reasonably compensate them. However, Plaintiffs reserve the right to either file a trial amendment or an amended pleading on this issue should subsequent evidence show this figure to be either too high or too low.

FACTS

On or about May 20, 2014, Plaintiff, PABLO SANCHEZ, was operating his vehicle in a reasonable and prudent manner westbound on the Interstate Highway 10 in CHAMBERS County, Texas. Plaintiffs, GUADALUPE SANCHEZ, HERMELINDA SALDANA, RICHARD SALDANA, were passengers in Plaintiff, PABLO SANCHEZ's vehicle. Defendant, ADRIAN BRUCE ADELS, was operating a vehicle owned by Defendant HORNBECK OFFSHORE SERVICES, LLC, in the course and scope of his employment with said Defendant and was travelling westbound on the aforesaid road in a lane directly adjacent to Plaintiff's lane of travel. Suddenly and without warning, Defendant, ADRIAN BRUCE ADELS, changed lanes when unsafe and struck Plaintiff's vehicle causing a severe impact. Due to the collision, Plaintiffs sustained serious bodily injuries and property damage.

NEGLIGENCE OF ADRIAN BRUCE ADELS

Defendant ADRIAN BRUCE ADELS had a duty to exercise the degree of care that a reasonably careful person would use to avoid harm to others under

circumstances similar to those described herein.

Plaintiffs' injuries were proximately caused by Defendant ADRIAN BRUCE ADELS'S negligent, careless and reckless disregard of said duty.

The negligent, careless and reckless disregard of Defendant ADRIAN BRUCE ADELS consisted of, but is not limited to, the following acts and omissions:

- A. In that Defendant ADRIAN BRUCE ADELS failed to keep a proper lookout for Plaintiffs safety that would have been maintained by a person of ordinary prudence under the same or similar circumstances;
- B. In that Defendant ADRIAN BRUCE ADELS failed to turn the vehicle he was driving in an effort to avoid the collision complained of;
- C. In that Defendant ADRIAN BRUCE ADELS failed to maintain a clear and reasonable distance between the motor vehicles in front of him and his vehicle which would permit him to bring the vehicle he was driving to a safe stop without colliding into Plaintiff's motor vehicle or the vehicle in front of him;
- D. In that Defendant ADRIAN BRUCE ADELS failed to keep such distance away from Plaintiff's motor vehicle and/or the vehicle directly in front of him as a person using ordinary prudent care would have done;
- E. In that Defendant ADRIAN BRUCE ADELS was operating the vehicle he was driving at a rate of speed which was greater than that would have been operated by a person of ordinary prudence under the same or similar circumstances;
- F. In that Defendant ADRIAN BRUCE ADELS failed to apply his brakes to the vehicle he was driving in a timely and prudent manner in order to avoid the collision in question;
- G. In that Defendant, ADRIAN BRUCE ADELS violated Texas Transportation Code § 545.103 by turning the vehicle he was driving in a manner that was unsafe under the existing circumstances;
- H. In that Defendant ADRIAN BRUCE ADELS violated Texas Transportation Code § 545.060 by failing to maintain a single lane of

traffic on a roadway laned for traffic; and

- I. In violating Texas Transportation Code § 545.103 by failing to make a safe movement of a vehicle.

**NEGLIGENCE OF DEFENDANT, HORNBECK OFFSHORE SERVICES,
LLC,**

At the time of the accident that occurred on May, 20, 2014, Defendant, ADRIAN BRUCE ADELS, was in the course and scope of his employment with Defendant, HORNBECK OFFSHORE SERVICES, LLC Defendant is liable under the doctrine of respondeat superior and is vicariously liable for the action of their employee. Further, Defendant was negligent in entrusting the vehicle to Defendant, ADRIAN BRUCE ADELS, because Defendant knew or should have known that Defendant, ADRIAN BRUCE ADELS, was a careless, reckless, and/or unlicensed driver. Finally, Defendant was negligent in failing to train, hire, and supervise Defendant's employee, Defendant, ADRIAN BRUCE ADELS, in the operation of the motor vehicle which Defendant, ADRIAN BRUCE ADELS, was operating at the time of the accident giving rise to this suit.

DAMAGES FOR PLAINTIFFS

As a direct and proximate result of the occurrence made the basis of this lawsuit Plaintiffs were caused to suffer serious injuries to their bodies, and to incur the following damages:

- A. Reasonable medical care and expenses in the past. These expenses were incurred by Plaintiffs for the necessary care and treatment of the injuries resulting from the accident complained of herein and such charges are reasonable and were usual and customary charges for such services in CHAMBERS County, Texas;

- B. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- C. Physical pain and suffering in the past;
- D. Physical pain and suffering in the future;
- E. Physical impairment in the past;
- F. Physical impairment which, in all reasonable probability, will be suffered in the future;
- G. Loss of earnings in the past;
- H. Loss of earning capacity which will, in all probability, be incurred in the future;
- I. Property damage to the vehicle;
- J. Mental anguish in the past;
- K. Mental anguish in the future;
- L. Physical disfigurement in the past;
- M. Physical disfigurement which, in all reasonable probability, will be suffered in the future;

RULE 194 REQUESTS FOR DISCLOSURE

Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Defendants are hereby requested to disclose, within fifty (50) days of service of this Petition and this request, the information or material described in Rule 194.2(a)-(l).

PRAYER

WHISEFORE, PREMISES CONSIDERED, Plaintiffs respectfully pray that the Defendants be cited to appear and answer herein and that upon a final

hearing of the cause, judgment be entered for the Plaintiffs against Defendants, jointly and severally, for damages in an amount within the jurisdictional limits of the Court; excluding interest, and as allowed by Sec. 41.008, Chapter 41, Texas Civil Practice and Remedies Code, together with pre-judgment interest (from the date of injury through the date of judgment) at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted,



By: _____

Cristobal M. Galindo

Texas Bar No. 24026128

Matthew C. Moore

Texas Bar No. 24082094

4151 Southwest Freeway, Suite 602

Houston, Texas 77027

Tel. (713)228-3030

Fax. (713)228-3003

ATTORNEYS FOR PLAINTIFFS



Office of Judgment Enforcement
1302 Waugh Dr #272
Houston TX 77019

Hornbeck Offshore Services LLC
C/O Corporation Service Company DBA CSC-Lawyers
Incorporating Service Company
211 E. 7th Street Ste 620
Austin TX 78701-3218



CORPORATION SERVICE COMPANY[®]

Notice of Service of Process

null / ALL
Transmittal Number: 15228330
Date Processed: 06/06/2016

Primary Contact: Samuel Giberga
Hornbeck Offshore Services
103 Northpark Blvd.
Suite 300
Covington, LA 70433

Copy of transmittal only provided to: Beth Labrosse
Karen Schloegel

Entity:	Hornbeck Offshore Services, LLC Entity ID Number 2781118
Entity Served:	Hornbeck Offshore Services, LLC
Title of Action:	Pablo Sanchez vs. Hornbeck Offshore Services, LLC
Document(s) Type:	Citation/Petition
Nature of Action:	Personal Injury
Court/Agency:	Chambers County District Court, Texas
Case/Reference No:	CV30146
Jurisdiction Served:	Texas
Date Served on CSC:	06/03/2016
Answer or Appearance Due:	10:00 am Monday next following the expiration of 20 days after service
Originally Served On:	CSC
How Served:	Certified Mail
Sender Information:	Cristobal M. Galindo 322-830-30

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
CSC is SAS70 Type II certified for its Litigation Management System.
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